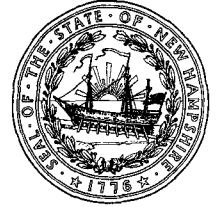




The State of New Hampshire  
**Department of Environmental Services**



Michael P. Nolin  
Commissioner

July 22, 2005

**LETTER OF DEFICIENCY #WSEB 05-084**  
Certified Mail # 7099 3400 0003 0690 2435

Eugene Edwards  
Hillsborough Board of Water Commissioners  
PO Box 7  
Hillsborough, NH 03244-0007

Subject: Hillsborough – Public Water System: Hillsborough Water Works (EPA# 1141010)

Dear Mr. Edwards:

The records of the NH Department of Environmental Services (DES) show that the Hillsborough Water Works (HWW) water system is classified as a public water system (PWS), as defined by RSA 485:1-a. A PWS is defined as any water system supplying 15 or more services, or 25 or more people for 60 or more days per year. HWW injects sodium hypochlorite into the drinking water as a disinfectant to provide bacteriological protection to consumers. As a result, HWW is required to submit water samples for Total Trihalomethanes (TTHM) analysis to the State laboratory or a State-certified laboratory in compliance with NH Administrative Rule Env-Ws 382, *Disinfectant/Disinfection Byproducts Rule*.

Pursuant to Env-Ws 317.70, the maximum contaminant level (MCL) for TTHMs is 0.080 mg/L. Pursuant to Env-Ws 382.16, compliance with the MCL for TTHMs is determined by calculating the running annual average, computed quarterly, of quarterly averages of all samples collected. The HWW's running annual average for TTHMs was 0.106 mg/L for the fourth quarter of 2004 (Q4-04), 0.113 mg/L for Q1-05, and 0.104 mg/L for Q2-05. Thus the water system has incurred TTHM MCL violations for three consecutive quarters.

It is our understanding that HWW is undertaking a capital improvement project that includes replacement of the existing transmission main. This project may reduce the chlorine contact time in the pipe and thus lower the potential formation of TTHMs.

DES believes the MCL violations can be corrected and future violations prevented by taking the following actions:

1. **By August 5, 2005**, submit to DES a schedule for completion of the proposed transmission main replacement project; and
2. **By August 26, 2005**, submit to DES for review a plan to evaluate the impact of the capital improvement project on TTHM levels.

In the event compliance is not achieved within this period. DES may initiate formal action against the Board, including issuing an order requiring the deficiencies to be corrected, initiating an administrative fine proceeding, and/or referring the matter to the NH Department of Justice for imposition of appropriate penalties.

**All information as requested above should be addressed as follows  
or faxed to (603) 271-5171:**

Alan Leach  
Department of Environmental Services  
Water Supply Engineering Bureau  
29 Hazen Drive, PO Box 95  
Concord, NH 03302-0095

Please be reminded that proposed treatment alternatives should take into consideration all water quality parameters as well as current and future quantity needs. In addition to your operator, assistance may be available to you through a variety of sources. DES Staff member Richard Skarinka, P.E., may be able to answer questions concerning treatment for TTHMs. He may be reached at (603) 271-2948 or via email at [rskarinka@des.state.nh.us](mailto:rskarinka@des.state.nh.us). Also, financial, managerial and technical assistance is available through either of two government funded technical assistance providers. These are NH Rural Water Association (1-800-556-3792) and RCAP Solutions, Inc. (1-800-488-1969). Health related questions may be directed to Dave Gordon of the DES Bureau of Environmental and Occupational Health whose number is (603) 271-4608. If you have any questions regarding this letter, please contact Alan Leach at (603) 271-2854 or by email at [aleach@des.state.nh.us](mailto:aleach@des.state.nh.us).

Sincerely,

**COPY**

Sarah Pillsbury, P.G., Administrator  
Water Supply Engineering Bureau

h:\wseb\enfmon\enforce\lods\dbp\1141010 tthm mcl lod 05-084.doc

cc: Gretchen R. Hamel, DES Legal Unit Administrator  
James Coffey, Hillsborough Health Officer  
Keith Gilbert, Primary Operator  
EPA, Region 1

cc: Rick Skarinka, DES  
Dave Gordon, DES BEOH  
John Lukin, NHRWA  
Robert Morancy, RCAP Solutions, Inc.